Langford Broadcast Group (LBG) respectfully tenders comments to change existing FCC regulations pertaining to use of FM translators.

The use of translators by AM radio stations has proven to be one of the most positive moves of the last 20 years by the FCC. The change to allow AM stations has saved many stations from turning in the operating license and going dark.

LBG does see where the translator service can be improved with no detrimental effect on existing stations.

Current regulations allow translators to operate with up to 250 watts of effective radiated power. No height limit is placed on this service and if high enough a translator will mimic coverage of a regular class A FM station.

Because many AM stations are forced to use their own towers to mount an FM translator they run into a situation where the restriction to 250 watts severely limits coverage because the FM antenna height above average terrain is very limited due to two factors. AM towers are often located in very low areas where the ground tends to be better for ground conductivity and the stations located toward the high end of the dial have short towers with many AM stations operating into towers less than 160 feet tall. Tower location and height limitation coupled with the fact that AM towers are often very removed from the city of license due to real estate needs makes tower mounted FM translators end up not serving the AM station as well as they should. LBG suggests that FCC rules be changed to allow power in excess of 250 Watts for FM translators that meet strict criteria to use higher power. For instance if a translator must be mounted at a height lower than 50 meters, it might be allowed to increase ERP to to a new higher limit. The matter needs further study and a proposed rule making. Conversely the commission should consider limiting the output power of translators in urban areas that use extreme height to in fact mimic Class A operation “hogging” spectrum that was not intended to be populated d by a new

Class A. LBG suggests that heights over 800 feet be subject to power reduction to maintain translators in the same service class as intended and not create Class A stations from lucky height availability.

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